

Glum, Scott

From: Glum, Scott
Sent: Wednesday, April 11, 2018 3:53 PM
To: 'Linnear, David'
Subject: FW: Pristine Superfund Site
Attachments: Duke Letter to USEPA 4-11 18 final .docx

Hello David. Looks like Pristine Trust and GHD concerns about the Duke pipeline have been resolved. Ohio EPA has no issues related to the pipeline route near the site.

-Scott

Scott Glum

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From: Olberding, James H [mailto:James.Olberding@duke-energy.com]
Sent: Wednesday, April 11, 2018 1:01 PM
To: Linnear, David <linnear.david@epa.gov>
Cc: Glum, Scott <scott.glum@epa.ohio.gov>
Subject: Pristine Superfund Site

David: I met with Henry Cooke from GHD this morning to review the location of the extraction wells and associated piping. Henry requested we adjust our Mainline Valve location slightly to the south, in order to provide additional clearance between the valve and a nearby monitoring and extraction well. We are in the process of making that adjustment. Additionally, I walked the West Street area in the location of the other extraction wells and piping runs with Henry and he was in agreement that, with a representative from GHD present during installation, we could install the pipeline without impacting the Pristine off-site equipment.

Please review the attached letter detailing the Duke request and provide your response.

If you have any questions please feel free to contact me.

Thank You
Jamie

James Olberding, PMP
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April 11, 2018

David Linnear
Adrian Palomeque
U.S. Environmental Protection Agency

Via e-mail

Duke Energy Ohio, Inc., (Duke Energy Ohio or Company) is planning to install a subsurface natural gas pipeline (Pipeline Project) in central Cincinnati near the Pristine Superfund Site in Reading, Ohio. Because the proposed route is near this site, we are asking for confirmation that the involvement of the United States Environmental Protection Agency (USEPA) is not required.

The location of the proposed Pipeline Project is approximately 100 feet east of the Pristine property. The pipeline is not proposed to be installed on the Pristine property and is never closer than 100 feet to the Pristine property at any point. A key consideration in determining installation/construction methods near the Pristine site was to select a method that would not exacerbate contamination (if encountered) and that would not negatively impact remediation efforts at the site. Therefore, the pipeline will be installed via open trench method (maximum depth of 10 feet) in the vicinity of the Pristine Superfund Site.

The Company has met with the Pristine Trust environmental consultant, GHD Services Inc. (GHD), concerning the Pristine property and particularly the location of the off-site extraction wells and associated piping located along West Street in Reading, Ohio. GHD requested that the Mainline Valve Site be moved slightly south of its current location to obtain a greater clearance from a nearby monitoring well and extraction well. Duke Energy Ohio will make that modification to satisfy the request. After walking the area with GHD and discussing installation methods, GHD concluded that neither the wells nor the piping would be impacted by the installation of the Duke Energy Ohio pipeline along the proposed route. In addition, to satisfy the Pristine Trust during installation, the Company will maintain communication with GHD with regard to the construction schedule near Pristine and the West Street area so that a representative from GHD can be present during excavation activities near the Pristine site.

It is Duke Energy Ohio's opinion that pipeline installation located east and south of the Pristine site will not result in encountering environmental impacts, nor will the pipeline's installation or subsequent existence impede any ongoing remedial activities that may occur at the site. The Company's opinion is supported by lack of evidence of any shallow soil impacts and the reported groundwater impacts being substantially deeper than proposed depth of the pipeline. In addition, the pipeline design incorporates safe installation methods near the Pristine off-site equipment.

Duke Energy Ohio is requesting a response from USEPA that supports Duke Energy's assessment that (1) the USEPA's involvement in the siting process is not required and (2) the pipeline would not negatively impact ongoing remediation activities at the Pristine site, nor would the proximity of the Pristine site have negative effects on the pipeline.

Sincerely,

James Olberding
Senior Project Manager
Duke Energy Ohio, Inc.